

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

In re:

FAIRFIELD SENTRY LIMITED, et al.,

Debtor in Foreign
Proceedings.

Chapter 15 Case

Case No. 10-13164 (SMB)

Jointly Administered

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

ABN AMRO SCHWEIZ AG, et al.,

Defendants.

Adv. Pro. No. 10-03635 (SMB)

NOTICE OF FILING OF FURTHER PROPOSED AMENDED COMPLAINT

PLEASE TAKE NOTICE that Plaintiffs, by and through Kenneth M. Krys and Greig Mitchell (together, the “Liquidators” or “Foreign Representatives”), in their capacities as the duly appointed Liquidators and Foreign Representatives of Fairfield Sentry Limited (In Liquidation) (“Sentry”), Fairfield Sigma Limited (In Liquidation) (“Sigma”), and Fairfield Lambda Limited (In Liquidation) (“Lambda” and, collectively with Sentry and Sigma, the “Funds”) in these consolidated adversary proceedings (the “U.S. Redeemer Actions”) hereby file the enclosed further proposed amended complaint in the above-captioned adversary proceeding (the “Further Proposed Amended Complaint”).

PLEASE TAKE FURTHER NOTICE that a clean copy of the Further Proposed Amended Complaint is filed herewith as **Exhibit 1**.

PLEASE TAKE FURTHER NOTICE that a document showing the Further Proposed Amended Complaint redlined against the operative complaint in the above-captioned adversary proceeding is filed herewith as **Exhibit 2**.

Dated: New York, NY
January 15, 2020

Respectfully submitted,

SELENDY & GAY PLLC

By: /s/ David Elsberg
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